



CITY OF EAST CHICAGO
Anthony Copeland, Mayor

Nickie Geros
Pretreatment Coordinator
5201 Indianapolis Boulevard
East Chicago, IN 46312
Phone: (219) 391-8466
Fax: (219) 391-8254
Email: ngeros@eastchicago.com

February 14, 2019

Natalie Maupin
Indiana Department of Environmental Management
Office of Water Quality-Mail Code 65-42
Compliance Evaluation Section-Pretreatment Group
100 North Senate
Indianapolis, IN 46204-2251

**RE: East Chicago Sanitary District
Quarterly Compliance Pretreatment Report
4th Quarter Report of 2018**

To Natalie Maupin:

In accordance with Part III A (1) of the NPDES Permit No. 0022829, the East Chicago Sanitary District Pretreatment Staff has prepared and enclosed the Quarterly Report for the 4th Quarter of 2018. Should you have any questions, please contact me at (219) 391-8466.

Sincerely,

Nickie Geros

CC: Newton Ellens, USEPA
Abderrahman Zehraoui, Ph.D., Director of Utilities, ECSD
Kenneth Myers, Compliance Manager, ECSD

Encls.

EAST CHICAGO SANITARY DISTRICT
EAST CHICAGO, INDIANA
FOURTH QUARTER
INDUSTRIAL COMPLIANCE STATUS REPORT
2018

NICKIE GEROS
PRETREATMENT COORDINATOR

February 14, 2019

Except for the permitted IUs involving groundwater remediation projects (Outfalls 112, 124 and 411), each of the permitted IUs are sampled on monthly basis, as a minimum. This compliance report covers the period from October 1, 2018 to December 31, 2018.

The following permitted industrial users (IUs) were sampled during this quarter.

Outfall	Company	Sample Date 1	Sample Date 2	Sample Date 3	Sample Date 4
112	GATX ¹				
124	Buckeye Pipeline ²	12/19/18			
312	Electric Coatings	10/10/18	11/14/18	12/5/18	
401	WR Grace	10/1/18	11/6/18	12/3/18	
411	USS Lead Site ³	11/21/18			
415	TAC East	10/24/18	11/7/18	12/5/18	
511	Green Lake Tube	10/16/18	11/1/18	12/12/18	
514	National Processing	10/16/18	11/1/18	12/12/18	
518	ICO Polymers	10/4/18	11/7/18	12/19/18	
521	Lakeshore Railcar	10/17/18	10/30/18	11/15/18	12/19/18
531	Praxair, Inc. Production	10/9/18	11/26/18	12/11/18	
541	Praxair, Inc. Rare Gases	10/9/18	11/26/18	12/11/18	
611	Arcelor Mittal- Research	10/8/18	11/13/18	12/13/18	
804	Arcelor Mittal East	10/23/18	11/27/18	12/10/18	
805	Arcelor Mittal East	10/23/18	11/27/18	12/10/18	
901	Safety-Kleen	10/11/18	10/31/18	11/8/18	12/6/18
931	Arcelor Mittal West	10/15/18	11/19/18	12/18/18	
934	Arcelor Mittal West	10/3/18	11/19/18	12/4/18	
935	Arcelor Mittal West	10/29/18	11/13/18	12/18/18	
936	US Steel	10/22/18	11/5/18	12/17/18	
941	Praxair, Inc. HyCO	10/25/18	11/20/18	12/6/18	
951	US Gypsum	10/2/18	11/6/18	11/28/18	12/13/18

One IU, 421 Central States Marketing, has been removed as a permitted facility as it has been determined that the nature and volume of their discharge does not justify the need for an industrial permit. The permit for Central States Marketing was terminated effective September 1, 2018 in a correspondence dated September 25, 2018. One IU, 112 GATX, consisting of a groundwater remediation system for treating impacted petroleum groundwater, did not complete sampling during the quarter as the remediation system was mostly down for repairs and/or maintenance. Sampling was completed on September 21, 2018 as part of the initial start-up of the treatment system and did not report any violations.

The East Chicago City Council adopted by ordinance the revised Sewer User Ordinance (SUO), OrdinanceNo.18-0017, on November 13, 2018. The new Ordinance included revisions mandated by the United States Environmental Protection Agency (USEPA) so that the East Chicago Sanitary District's NPDES (National Pollution Discharge Elimination System) permit process and sewer discharge regulations reflect the requirements of federal law published in the Code of Federal Regulations (CFR). These changes were necessary to address specific deficiencies contained in USEPA comments in the Administrative Consent Order issued to the District November 14, 2014. Moreover, the revisions included the adoption of revised local limits that were proposed in a Local Limit Study. In a letter dated December 20, 2018, the USEPA approved the codified SUO, the supporting Local Limit Study, our Enforcement Response Plan (ERP) and the Legal

¹ GATX GW Remediation project, Initial start-up sampling completed on 9/21/18, no quarterly sampling due to treatment system operational and maintenance issues

² Buckeye Pipeline GW Remediation project, self-monitoring sampling completed on 12/19/18

³ US Lead GW Remediation project, quarterly self-monitoring sampling completed on 11/21/18

Authority Letter by the District to implement and administer all federal requirements of the District's Pretreatment Program.

Each of the permitted IUs was notified via email on November 15, 2018 of the newly adopted SUO and revised local limits. Moreover, each of the IUs was provided revised permits incorporating the new SUO provisions and local limits on, or before, January 30, 2019.

During the 4th quarter of 2018, the following Categorical Industrial Users (CIUs) experienced violations with the following parameters and are summarized as follows:

<u>OUTFALL</u>	<u>COMPANY</u>	<u>PARAMETER</u>	<u>VIOLATION</u>
521	Lakeshore Railcar & Tanker Services	1 O&G, 1 Available CN	Categorical, Local & TRC
901	Safety-Kleen Systems	3 Available CN	Local & TRC Exceedance

One IU, ICO Polymers (518,) had a residual chlorine concentration of 0.58 mg/L, in excess of the local limit of 0.4 mg/L. No other violations were noted during the 4th quarter 2018 pretreatment monitoring by the District or IU self-monitoring reports.

During the 4th Quarter of 2018, the violations noted above were handled in accordance with the Sanitary District's Response Plan and Sewer Ordinance. The following summarizes the Notices of Violations (NOVs) and fines that were issued to the various users.

1. Lakeshore Railcar & Tanker Services, Outfall No. 521, exceeded the local limit for available cyanide on December 19, 2018 with the analytical result of 1.0 mg/L. A NOV along with a \$1,000 fine was sent on January 17, 2019. Lakeshore Railcar also exceeded their categorical limit for oil & grease on December 19, 2018. A NOV for the oil & grease exceedance along with a fine of \$1,000 was sent on January 30, 2018.

2. Safety-Kleen Systems, Outfall No. 901, which is a CSIU categorized as a CWT under 40CFR 437.25, had three exceedances of available cyanide On October 10, October 31 and November 8, 2018. NOV letters for each occurrence were sent on November 20, 2018, December 5, 2018 and January 29, 2019, each with a fine of \$2,500.

3. ICO Polymers, Inc., Outfall 518, had an exceedance of residual chlorine on October 4, 2018. Because the municipal water supply typically has a residual chlorine content ranging between 0.5 and 1.5 mg/L, ICO Polymers was issued a Notice of Violation (NOV) for its exceedance but was not fined as the total concentration was within the range of the normal potable water supply. Additionally, the newly adopted local limits have removed residual chlorine as a pollutant of concern for all IU discharges going forward.

A Quarterly Summary Report for each IU presenting the results of the sampling completed between the periods October 1 through December 31, 2018 is included as an attachment to this letter.

Each of the eight Significant Industrial Users was inspected from December 20 through December 28. Three are Significant Industrial Users (SIUs); W.R. Grace-Conn (401) on December 21, Praxair Whiting H2 Plant (941) on December 21, and United States Gypsum (951) on December 20 are not Categorical Industrial Users. The other five SIUs are Categorical Significant Industrial Users (CSIUs); identified as Electric Coating Technologies (312) on December 27, TAC East (415) on December 26, National Processing (514) on December 27, Lakeshore Railcar & Tanker Services LLC (521) on December 28, and Safety-Kleen Systems Inc. (901) on December 26. No significant areas of concern were noted in any of the inspections with regards to their safety, housekeeping, proper waste removal, and day-to-day operating policies and practices. Final Inspection Summary reports are being prepared by staff.